UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Mr. Tony Hobson
Vice President of Manufacturing
New-Indy Catawba, LLC d/b/a New-Indy Containerboard
5300 Cureton Ferry Road
Catawba, South Carolina 29704
tony.hobson@new-indycb.com

Dear Mr. Hobson:

Pursuant to Section 114(a)(1) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a)(1), you are hereby required to provide the U.S. Environmental Protection Agency with information relating to the New-Indy Catawba, LLC d/b/a New-Indy Containerboard (New Indy) facility, located in Catawba (York County), South Carolina. This information is needed to determine whether the New Indy facility is in compliance with requirements of the Act and its implementing regulations. Section 114(a) of the Act, 42 U.S.C. § 7414(a), authorizes the Administrator of the EPA to require any person who owns or operates an emission source, whom the Administrator believes may have information necessary for the purposes set forth in Section 114(a), or who is subject to any requirement of the Act, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the Act. This authority has been duly delegated to the Director of the Enforcement and Compliance Assurance Division, Region 4.

Please review and follow the instructions in and, where required, complete the following enclosures: Instructions (Enclosure 1), Definitions (Enclosure 2), Claiming Confidentiality (Enclosure 3), Information Request (Enclosure 4), and Statement of Certification (Enclosure 5).

The requested information shall be submitted to the EPA electronically, per the instructions in Enclosure 1. The responses shall be submitted **no later than forty-five (45) calendar days** after New Indy's receipt of this letter as determined by the date of the EPA's electronic mail transmitting this request, unless the EPA, for good cause shown, extends in writing the deadline for responding to this request. This information must be submitted electronically to the following individual:

Kevin Taylor
Environmental Engineer
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
taylor.kevin@epa.gov

Failure to provide the information required by this letter is a violation of the Act and may result in one or more of the following actions: (1) issuance of an order requiring compliance with this request; (2) issuance of an administrative penalty order pursuant to Section 113(d) of the Act, 42 U.S.C. § 7413(d); (3) commencement of a civil action in accordance with Section 113(b) of the Act, 42 U.S.C. § 7413(b); and/or (4) any other action authorized under the Act.

Under Section 114(c) of the Act, 42 U.S.C. § 7414(c), and pursuant to the regulations found at 40 C.F.R. Part 2, Subpart B, including 40 C.F.R. § 2.301, you are entitled to assert a claim of business confidentiality for any information you provide to the EPA that involves trade secrets and which New Indy regards as confidential business information (CBI). For such information, you may request that the EPA treat such information as confidential. Any such claim of confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). Note that "emission data," as defined by 40 C.F.R. § 2.301(a)(2), cannot be claimed as confidential under Section 114(c) of the Act, 42 U.S.C. § 7414(c). For detailed instructions for claiming confidentiality, please see Enclosure 3. Information you supply under a claim of confidentiality will be treated in accordance with 40 C.F.R. Part 2, Subpart B, and will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to New Indy. Please note that any confidentiality claim does not obviate the need to send that portion of the response to the EPA.

The response to the information requested must be accompanied by Enclosure 5, Statement of Certification, which is to be signed and dated by a responsible official of New Indy. This statement certifies that the response submitted to the EPA is complete and contains all documents and information responsive to this request that are known to you, following a complete and thorough review of all information and sources available to you.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 – 3520, because it seeks information from specific individuals or entities as part of an investigation.

If you have any questions regarding this matter, please contact Kevin Taylor at (404) 562-9134 or by email at taylor.kevin@epa.gov or Andrew Mills at (404) 562-9030 or by email at mills.andrew@epa.gov.

Sincerely,

CAROL KEMKER

Digitally signed by CAROL KEMKER
Date: 2022.01.21 10:32:02 -05'00'

Carol L. Kemker
Director
Enforcement and Compliance Assurance Division

Enclosures

cc:

Pete Cleveland, Technical Manager
New Indy Catawba
pete.cleveland@new-indycb.com

Daniel Mallett, Environmental Manager
New Indy Containerboard
dan.mallett@new-indycb.com

Rhonda B. Thompson, Chief
Bureau of Air Quality, SC DHEC
thompsrb@dhec.sc.gov

ENCLOSURE 1

Instructions

Each of the following instructions applies to each and every Request contained in Enclosure 4.

1. Provide a separate response to each and every Request, and each and every subpart of a Request.

2. If the company has no responsive information or documents pertaining to a particular Request, submit an affirmative statement and explanation.

3. Indicate on each document produced, or in some other reasonable manner, the number of the Request to which it corresponds. If a document is responsive to more than one Request, this must be so indicated and only one (1) version of the document needs to be provided.

4. The company shall submit documents in Portable Document Format (PDF) or in any other electronic format as specified in Enclosure 4. Do not create separate PDF files for each page of a single document.

5. Where a Request requires the submission of an electronic spreadsheet, please provide the spreadsheet as an unlocked, Microsoft Excel file. If Excel format is not available, then the format should allow for data to be imported and used in calculations by a standard spreadsheet program such as Microsoft Excel.

6. Identify each person whom you relied on or consulted with in preparing your responses to each Request. Provide their name, title, job duties and duration of employment with the company. If they are not an employee of the company, identify their employer and provide their name, title, job duties and duration of employment with their employer.

7. If requested information or documents are not known or are not available to you at the time of your response to this information request, but later become known or available to you, you must supplement your response to the EPA within 30 calendar days of discovery of the responsive information. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete or misrepresents the facts, you must provide the EPA with a corrected response as soon as possible.

8. Please submit your response to this information request to the EPA electronically. You may submit your response using either of the following options: (A) As an attachment sent via email to Mr. Kevin Taylor at taylor.kevin@epa.gov and Andrew Mills at mills.andrew@epa.gov; or (B) by requesting a link from the EPA for a secure file transfer site where you may upload your response. You may request a link by sending an email to Kevin Taylor at taylor.kevin@epa.gov and Andrew Mills at mills.andrew@epa.gov.

9. Please do not submit compressed files (.zip) via email. If you wish to submit compressed files, please select option B.

10. Please do not send documents that you have claimed as confidential business information (CBI) to the EPA by email (option A). If you are submitting documents that you have claimed as CBI, please upload them to the EPA's secure file transfer site (option B).

11. Prior to submitting your response, please send an email to Kevin Taylor at taylor.kevin@epa.gov and Andrew Mills at mills.andrew@epa.gov indicating which option or combination of options (A and/or B) you have selected to submit your response to this request.

ENCLOSURE 2

Definitions

1. The terms **"document"** and **"writing"** and the plural forms thereof shall mean all written, recorded or graphic matters, however produced or reproduced, of every kind and description, pertaining in any way to the subject matter of this request, and which are in the company's possession, custody or control or to which the company has or has had access. The terms "document" and "writing" shall include, but are not limited to: any receipts; invoices; shipping records; purchase orders; purchase records; books; pamphlets; periodicals; memoranda (including those of telephone or oral conversations); contracts; correspondence; agreements; applications; financial records; security instruments; disbursements; checks; bank statements; time records; accounting or financial records; notes; diaries; logs; facsimiles (faxes); telegrams or cables prepared, drafted, received or sent; electronic mail (email), whether drafted, received or sent; tapes; transcripts; recordings; minutes and notes of meetings; directives; work papers; charts; drawings; prints; flow sheets; photographs; infrared camera recordings; film; computer printouts; x-ray photographs; advertisements; catalogs; data; sampling reports, plans, protocols, reports, analyses; or any handwritten, recorded, transcribed punched, taped, filmed or graphic matter, however produced or reproduced.

2. The terms **"person"** and/or **"persons"** shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.

3. The terms **"relate to"** and/or **"pertain to"** (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

4. The terms **"you"**, "**your**" and/or **"New Indy"** shall mean New-Indy Catawba, LLC d/b/a New-Indy Containerboard, and all its agents, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, and contractors. These terms shall also mean any others who are not listed above and are in possession, custody, or control (actual or constructive) of information relevant to this request or information that is otherwise available to New Indy, or who may have obtained information for or on behalf of New Indy.

All terms not defined in this enclosure have their ordinary meaning, unless such terms are defined in the Clean Air Act and/or its implementing regulations, and in which case the statutory and/or regulatory definitions apply. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions. The terms "and" and "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.

ENCLOSURE 3

Confidential Business Information (CBI)
Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering part or all of the information, other than emissions data and information or data that is otherwise publicly available, as described in 40 C.F.R. § 2.203(b). If no business confidentiality claim accompanies the information when it is received by the EPA, the EPA may make the information available to the public without further notice. To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any information over which you make a claim of confidentiality should be marked by placing on or attaching to the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret" or "proprietary" or "business confidential" and a date if any when the information should no longer be treated as confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. Information covered by such a claim will be disclosed by the EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Act, and 40 C.F.R. Part 2, Subpart B. The EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. Part 2, Subpart B.[1] You bear the burden of substantiating your confidentiality claim and must satisfactorily show, among other things, that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so and that the information is not, and has not been, reasonably obtainable by legitimate means without your consent. Conclusory allegations will be given little or no weight.

Before the EPA makes a final determination regarding your claim of confidentiality, pursuant to 40 C.F.R. Part 2, Subpart B, the EPA will send you a letter asking you to substantiate fully your CBI claim by answering several questions. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to meet the requirements so as to be entitled to confidential treatment. You must provide the EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time will be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information.

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[1] 40 C.F.R. § 2.208(e) conflicts with the holding in *Food Marketing Institute v. Argus Leader Media*, 139 S. Ct. 2356, 2366 (2019) (*Argus Leader*). In light of the *Argus Leader* decision, the Agency will not consider 40 C.F.R. § 2.208(e) in this determination. The Agency anticipates amending 40 C.F.R. § 2.208 so that it is consistent with the decision in *Argus Leader*.

The EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Please note that if a page, document, group or class of documents claimed by you to be confidential contains a significant amount of information which the EPA determines is not confidential, your confidentiality claim regarding that page, document, group or class of documents may be denied. For each item or class of information that you identify as being confidential, the EPA will ask you to answer the following questions, giving as much detail as possible, as conclusory allegations will be given little or no weight in the EPA's determination:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? If so, specify which.

5. Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

6. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, please explain whether the information is the kind that would customarily not be released to the public.

8. Whether you assert the information as voluntary or involuntary, please address why disclosure of the information would tend to lessen the availability to the EPA of similar information in the future.

9. If you believe any information to be (a) trade secret (s), please so state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be (a) trade secret (s).

10. Explain any other issue you deem relevant (including, if pertinent, reasons why you believe that the information you claim to be CBI is not emission data or effluent data).

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is *not* entitled to confidential treatment under Section 114(c) of the Act, 42 U.S.C. § 7414(c) or 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emission of any substance into the air - (A) information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing; (B) information necessary to determine the identity,

amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and (C) a general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Information designated confidential will be disclosed by the EPA only to the extent allowed by, and by means of procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

ENCLOSURE 4

Information Request Questions

You are hereby required, in accordance with Section 114(a) of the Clean Air Act, 42 U.S.C. § 7414(a), to provide the following information for the New-Indy Catawba, LLC d/b/a New-Indy Containerboard facility. Please note that all production and operating data should be provided in an Excel formatted electronic file.

General Process Information

1. Provide block process flow diagrams for the facility as a whole and for each process unit at the facility.
2. Provide a detailed plot plan of the facility.
3. Provide a list of all sources that feed into the non-condensable gas (NCG) system and provide a diagram of the NCG system. The diagram should show each source that vents to the system, the location of where each source ties into the system, the location of each bypass line, flow rate monitors, pressure gauges, and the associated control device. If there have been any sources which were added or removed from either the NCG system or the line which enters the incinerator from 2015 to the present, identify each of these sources and the justification for the addition or removal, along with the block flow diagrams showing the change.
4. Provide a diagram of the stripper off-gas (SOG) system. The diagram should show each source that vents to the system, the location of where each source ties into the system, the location of each bypass line, flow rate monitors, pressure gauges, and the associated control device.
5. Provide a list of each continuous emission monitoring system (CEMS) currently installed at the facility. For each CEMS provide the model type, the emission point, and the pollutant monitored.
6. Provide monthly totals of bleached pulp production from January 2005 to present (air dried tons of bleached pulp per month). Provide a narrative description of how the production rates were derived.
7. Provide the daily kappa number of the bleached pulp from January 2005 to present. Provide a narrative description of how the kappa number was derived.
8. Provide monthly totals of unbleached pulp production from January 2005 to present (air dried tons of unbleached pulp per month). Provide a narrative description of how the production rates were derived.
9. Provide the daily kappa number of the unbleached pulp from January 2005 to present. Provide a narrative description of how the kappa number was derived.
10. Provide the date, time, and duration of when the NCGs were vented to the atmosphere and not sent to the corresponding air pollution control device from January 1, 2015, to present.
11. Provide the date, time, and duration of when the stripper off gases were vented to the atmosphere and not sent to the corresponding air pollution control device from January 1, 2015, to present.
12. Provide copies of all documents that discuss emissions (i.e., hydrogen sulfide, methyl mercaptan, dimethyl sulfide, dimethyl disulfide, and volatile organic compounds) generated from shutting down the steam stripper and sending the kraft mill pulping process condensates to the aeration stabilization basin.
13. Provide copies of all documents that discuss emissions (i.e., hydrogen sulfide, methyl mercaptan, dimethyl sulfide, dimethyl disulfide, and volatile organic compounds) generated from the post aeration tank.
14. From January 1, 2015, to present, provide copies of all documents that discuss insufficient steam capacity issues or the need for additional steam capacity at the facility. In addition, provide copies of all documents that discuss any potential solutions to address the steam capacity issues.

15. Provide a list of all authorizations for expenditure (AFE) greater than $100,000 or capital appropriation requests (CAR) greater than $100,000 authorizing expenditures from January 1, 2005, to the present, as well as AFE or CAR projects greater than $100,000 which are planned, but not yet commenced. Please provide the information in electronic format and include at least the following details:
    a. The date that the AFE or CAR was submitted;
    b. The cost of the project proposed by the AFE or CAR; and
    c. A brief description of the project proposed by the AFE or CAR.
16. For each AFE or CAR project identified above, which has a capital expenditure of greater than $100,000, provide copies of all capital appropriation requests, financial justifications, and authorizations, including attachments and addenda, generated by, or prepared on behalf of the facility or its predecessors concerning that project.
17. Provide a copy of all permit applications submitted to the South Carolina Department of Health and Environmental Control from January 2005 to the present.
18. Provide copies of all documents generated on or after January 2005, relating to the applicability of the New Source Review (NSR) and/or Prevention of Significant Deterioration (PSD) provisions of the CAA.
19. Provide a list of all permits to construct and permits to operate issued from January 1, 2005, to present. Please include the following information in the list:
    a. Specify the date of permit issuance;
    b. Provide a list of equipment that was modified or constructed pursuant to the permit;
    c. State whether the permit is minor NSR, PSD, major non-attainment NSR or other type of permit; and
    d. If a permit is a PSD or major non-attainment NSR permit, specify the pollutants for which such permit was issued.
20. Provide all records from on or after January 1, 2015, where the company has determined "projected actual emissions" pursuant to 40 C.F.R. §52.21(b)(41). The response to this item shall include, but shall not be limited to:
    a. All documentation and rationale used to establish baseline emissions pursuant to 40 C.F.R. §52.21(b)(48).
    b. All documentation and rationale used to exclude emissions pursuant to §52.21(b)(41)(c).
21. Provide all records and notices generated since January 2005, pursuant to 40 C.F.R. §52.21(r)(6).

Wastewater Treatment System

22. Provide daily average data of the volumetric flow rate of foul condensate (gallon/hr) to the condensate steam stripper (ID 9801) from January 1, 2005, to present. Provide a narrative description of how the flow rates were derived.
23. Provide daily average data of the mass flow rate of steam (lb/hr) to the condensate steam stripper (ID 9801) from January 1, 2005, to present. Provide a narrative description of how the flow rates were derived.
24. Provide daily average data of the volumetric flow rate of foul condensate (gallon/hr) to the aeration stabilization basin from January 1, 2005, to present. Provide a narrative description of how the flow rates were derived.
25. Provide complete copies, including attachments and/or appendices, of any hydrogen sulfide monitor studies that were conducted at the facility from January 2005 to present.

26. Provide complete copies, including attachments and/or appendices, of any air emissions studies, evaluations or modeling conducted on the aeration stabilization basin from January 2005 to present.
27. Provide complete copies, including attachments, of any document that pertains to or discusses the inlet and/or outlet concentrations of any hydrogen sulfide, total reduced sulfur, and volatile organic compounds for the aeration stabilization basin from January 2005 to present.
28. Provide complete copies of any performance test or sampling that was conducted on the inlet and/or outlet concentrations of hydrogen sulfide, total reduced sulfur, and volatile organic compounds for the aeration stabilization basin from January 2005 to present.
29. Provide complete copies, including attachments, of any document that pertains to or discusses the inlet and/or outlet concentrations of any hydrogen sulfide, total reduced sulfur, and volatile organic compounds for the post aeration tank basin from January 2005 to present.
30. Provide complete copies of any performance test or sampling that was conducted on the inlet and/or outlet concentrations of hydrogen sulfide, total reduced sulfur, and volatile organic compounds for the post aeration tank from January 2005 to present.

Recovery Boiler No. 2

31. Provide copies of the information and documents of black liquor density and black liquor percent solids. Also provide a narrative description of how the company converts the black liquor firing rate from a volumetric flow rate to a mass flow rate.
32. Provide daily average data for recovery boiler #2 from January 1, 2005, to present, for the following parameters:
    a. Black liquor firing rate (gallon/minute);
    b. Black liquor recycling rate (gallon/minute);
    c. Virgin black liquor dry solids firing rate (lb BLS/day);
    d. Black liquor dry solids concentration from the evaporator in percentage solids (%);
    e. Black liquor dry solids concentration to furnace in percentage solids (%);
    f. Black liquor heating value (BTU/gallon);
    g. Black liquor organic/inorganic ratio;
    h. Gross heat input rate (million BTU/hr);
    i. Temperature (°F) in lower part of furnace;
    j. Steam flow rate (lb/hr);
    k. Steam temperature (°F);
    l. Steam pressure (psig);
    m. Superheater outlet temperature (°F);
    n. Superheater outlet pressure (psig);
    o. Feedwater inlet flow rate (lb/hr);
    p. Feedwater inlet temperature (°F);
    q. Total air flow rate from the fans (lb/hr);
    r. Air temperature (°F);
    s. Air pressure (psig);
    t. Air flow rate distribution to each level (% to primary, % to secondary, % to tertiary);
    u. Percentage (%) excess air to the boiler;
    v. Percentage (%) oxygen leaving economizer;
    w. Auxiliary fuel firing rates;
    x. Stack gas dry volumetric flow rate; and
    y. Stack gas temperature.

33. Provide copies of all stack test reports for particulate matter (PM), nitrogen oxides (NOx), volatile organic compounds (VOCs), carbon monoxide (CO), total reduced sulfur (TRS) compounds, and sulfur dioxide (SO2) performed for compliance, engineering, or other purposes from January 1, 2005, to present. The test reports should contain the summary of results, the production data, process operational data and the control device operational data collected during each test (i.e., input flow rates and control device parameters).
34. Provide copies of the TRS CEMS data from January 1, 2005, to present. This TRS CEMS data should be provided electronically in a spreadsheet.
35. Provide copies of the NOx CEMS data from January 1, 2005, to present. This NOx CEMS data should be provided electronically in a spreadsheet.

Recovery Boiler No. 3

36. Provide copies of the information and documents of black liquor density and black liquor percent solids. Also provide a narrative description of how the company converts the black liquor firing rate from a volumetric flow rate to a mass flow rate.
37. Provide daily average data for recovery boiler No. 3 from January 1, 2005, to present, for the following parameters:
    a. Black liquor firing rate (gallon/minute);
    b. Black liquor recycling rate (gallon/minute);
    c. Virgin black liquor dry solids firing rate (lb BLS/day);
    d. Black liquor dry solids concentration from the evaporator in percentage solids (%);
    e. Black liquor dry solids concentration to furnace in percentage solids (%);
    f. Black liquor heating value (BTU/gallon);
    g. Black liquor organic/inorganic ratio;
    h. Gross heat input rate (million BTU/hr);
    i. Temperature (°F) in lower part of furnace;
    j. Steam flow rate (lb/hr);
    k. Steam temperature (°F);
    l. Steam pressure (psig);
    m. Superheater outlet temperature (°F);
    n. Superheater outlet pressure (psig);
    o. Feedwater inlet flow rate (lb/hr);
    p. Feedwater inlet temperature (°F);
    q. Total air flow rate from the fans (lb/hr);
    r. Air temperature (°F);
    s. Air pressure (psig);
    t. Air flow rate distribution to each level (% to primary, % to secondary, % to tertiary);
    u. Percentage (%) excess air to the boiler;
    v. Percentage (%) oxygen leaving economizer;
    w. Auxiliary fuel firing rates;
    x. Stack gas dry volumetric flow rate; and
    y. Stack gas temperature.
38. Provide copies of all stack test reports for PM, NOx, VOCs, CO, TRS compounds, and SO2 performed for compliance, engineering, or other purposes from January 1, 2005, to present. The test reports should contain the summary of results, the production data, process operational data and the control device operational data collected during each test (i.e., input flow rates and control device parameters).

39. Provide copies of the TRS CEMS data from January 1, 2005, to present. This TRS CEMS data should be provided electronically in a spreadsheet.
40. Provide copies of the NOx CEMS data from January 1, 2005, to present. This NOx CEMS data should be provided electronically in a spreadsheet.

Lime Kiln No. 2

41. Provide monthly production data for the lime kiln from January 1, 2005, to present. The production data should include, but not be limited to, hours of operation (hours per month), fuel usage of all or any fuels fired (tons per month or gallons per month), lime mud flow rate (gallons per month), lime mud solids content (percent), and lime kiln production rate (tons of calcium oxide per month). Provide a narrative description of how the production rates were derived.
42. Provide copies of all stack test reports for PM, NOx, VOCs, CO, TRS compounds, and SO2 performed for compliance, engineering, or other purposes from January 1, 2005, to present. The test reports should contain the summary of results, the production data, process operational data and the control device operational data collected during each test (i.e., input flow rates and control device parameters).
43. Provide copies of the TRS CEMS data from January 1, 2005, to present. This TRS CEMS data should be provided electronically in a spreadsheet.

TRS Pre-Scrubber for Sulfur Recovery System

44. It is the EPA's understanding that the company operates a sulfur recovery system that treats the SOGs and the NCGs to recover sulfur compounds prior to being incinerated in one of the two combination boilers. Provide a detailed description of how the sulfur scrubbing system works, and the parameters the company monitors to ensure the sulfur recovery system is operating properly.
45. Provide copies of sampling data and flow rate data of the gas stream entering the sulfur recovery system. The sampling data should include, but not be limited to, hydrogen sulfide, methyl mercaptan, VOCs, and TRS compounds.
46. Provide copies of sampling data and flow rate data of the gas stream exiting the sulfur recovery system. The sampling data should include, but not be limited to, hydrogen sulfide, methyl mercaptan, VOCs, and TRS compounds.
47. Provide copies of the records of the pre-scrubber volumetric flow rate from January 1, 2005, to present.
48. Provide copies of the records of the pre-scrubber pH from January 1, 2005, to present.
49. Provide copies of records that show the pre-scrubber downtime from January 1, 2005, to present. The information should include, but not be limited to, the date and time the scrubber system went down and the date and time the scrubber system started up.

Combination Boiler No. 1

50. Provide monthly production data for the combination boiler #1 from January 1, 2005, to present. The production data should include, but not be limited to, hours of operation (hours per month), and fuel usage of all or any fuels fired (tons per month or gallons per month).
51. Provide daily average data for combination boiler #1 from January 1, 2005, to present, for the following parameters:
    a. Gross heat input rate (million BTU/hr);
    b. Volumetric flow rate of non-condensable gases to boiler (scfh);
    c. Volumetric flow rate of stripper off gases to boiler (scfh);
    d. Steam flow rate (lb/hr);
    e. Steam temperature (°F);

f. Steam pressure (psig);
g. Superheater outlet temperature (°F);
h. Superheater outlet pressure (psig);
i. Feedwater inlet flow rate (lb/hr);
j. Feedwater inlet temperature (°F);
k. Total air flow rate from the fans (lb/hr);
l. Air temperature (°F);
m. Air pressure (psig);
n. Air flow rate distribution to each level (% to primary, % to secondary, % to tertiary);
o. Percentage (%) excess air to the boiler;
p. Percentage (%) oxygen leaving economizer;
q. Auxiliary fuel firing rates;
r. Stack gas dry volumetric flow rate; and
s. Stack gas temperature.

52. Provide the date that combination boiler #1 was capable of firing tire derived fuel (TDF) and the date the boiler first burned TDF.
53. Provide a copy of the most recent sulfur analysis for the #6 fuel oil burned in combination boiler #1.
54. Provide a copy of the most recent sulfur analysis for the TDF burned in combination boiler #1.
55. Provide copies of all stack test reports for PM, NOx, VOCs, CO, TRS compounds, and SO2 performed for compliance, engineering, or other purposes from January 1, 2005, to present. The test reports should contain the summary of results, the production data, process operational data and the control device operational data collected during each test (i.e., input flow rates and control device parameters).
56. Provide monthly SO2 emissions records from the combustion of the NCGs and SOGs for combination boiler #1 from January 1, 2015, to present. The records should include, but not be limited to, the SO2 emission rate, the calculations used to determine the SO2 emissions, and any documentation that justifies the information used in the calculation.
57. Provide the monthly quantity of SOGs (scf/month) that have been incinerated in combination boiler #1 from January 1, 2005, to present.
58. Provide the monthly quantity of NCGs (scf/month) that have been incinerated in combination boiler #1 from January 1, 2005, to present.

Combination Boiler No. 2

59. Provide monthly production data for the combination boiler No. 2 from January 1, 2005, to present. The production data should include, but not be limited to, hours of operation (hours per month), and fuel usage of all or any fuels fired (tons per month or gallons per month).
60. Provide daily average data for combination boiler No. 2 from January 1, 2005, to present, for the following parameters:
    a. Gross heat input rate (million BTU/hr);
    b. Volumetric flow rate of non-condensable gases to boiler (scfh);
    c. Volumetric flow rate of stripper off gases to boiler (scfh);
    d. Steam flow rate (lb/hr);
    e. Steam temperature (°F);
    f. Steam pressure (psig);
    g. Superheater outlet temperature (°F);
    h. Superheater outlet pressure (psig);
    i. Feedwater inlet flow rate (lb/hr);

j. Feedwater inlet temperature (°F);
k. Total air flow rate from the fans (lb/hr);
l. Air temperature (°F);
m. Air pressure (psig);
n. Air flow rate distribution to each level (% to primary, % to secondary, % to tertiary);
o. Percentage (%) excess air to the boiler;
p. Percentage (%) oxygen leaving economizer;
q. Auxiliary fuel firing rates;
r. Stack gas dry volumetric flow rate; and
s. Stack gas temperature.

61. Provide the date that combination boiler No. 2 was capable of firing tire derived fuel (TDF) and the date the boiler first burned TDF.
62. Provide a copy of the most recent sulfur analysis for the #6 fuel oil burned in combination boiler No. 2.
63. Provide a copy of the most recent sulfur analysis for the TDF burned in combination boiler No. 2.
64. Provide copies of all stack test reports for PM, NOx, VOCs, CO, TRS compounds, and SO2 performed for compliance, engineering, or other purposes from January 1, 2005, to present. The test reports should contain the summary of results, the production data, process operational data and the control device operational data collected during each test (i.e., input flow rates and control device parameters).
65. Provide monthly SO2 emissions records from the combustion of the NCGs and SOGs for combination boiler No. 2 from January 1, 2015, to present. The records should include, but not be limited to, the SO2 emission rate, the calculations used to determine the SO2 emissions, and any documentation that justifies the information used in the calculation.
66. Provide the monthly quantity of SOGs (scf/month) that have been incinerated in combination boiler No. 2 from January 1, 2005, to present.
67. Provide the monthly quantity of NCGs (scf/month) that have been incinerated in combination boiler No. 2 from January 1, 2005, to present.

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68. Provide a complete copy, including all attachments, of the initial notification of compliance status report that was submitted. Also, provide complete copies of any revisions made to the notification of compliance status report.
69. Page 2-2 of The Initial Performance Test Plan (Test Plan), revised May 2021, provides a list of process condensates streams that are collected in the Foul Condensate Tank and treated in the aeration stabilization basin (ASB) or steam stripper. The Test Plan does not mention the process condensate from the turpentine recovery system, which is listed in the pulp and paper MACT (40 C.F.R. Part 63 Subpart S). Provide a detailed discussion of how the company handles and processes the condensate associated with the turpentine recovery system.
70. Page 2-2 of Test Plan provides a list of process condensates streams that are collected in the Foul Condensate Tank and treated in the ASB or steam stripper. The Test Plan does not mention the process condensate from the digester system, which is listed in the pulp and paper MACT (40 C.F.R. Part 63 Subpart S). Provide a detailed discussion of how the company handles and processes the condensate associated with the digester system.
71. Provide a copy of the initial characterization sampling data and flow rate data associated with each pulping process condensate stream listed in 40 C.F.R. § 63.446(b) used to show compliance with 40 C.F.R. § 63.446(c).

72. Provide copies of all sampling data and flow rate data associated with each pulping process condensate stream listed in 40 C.F.R. § 63.446(b) from September 2000 to present.
73. Provide copies of any documents that discuss the differences in concentration data and flow rate data of each condensate stream listed in 40 C.F.R. § 63.446(b) from September 2000 to present.
74. Provide a complete copy of the pulping system closed collection system inspection plan as required by 40 C.F.R. § 63.454(b).
75. Provide copies of the records of the pulping system closed collection system inspections from January 2010 through June 2021.
76. Provide copies of the records of the annual pulping system closed collection system Reference Method 21 evaluations from January 2010 through June 2021.
77. Provide a complete copy of the condensate closed collection system inspection plan as required by 40 C.F.R. § 63.454(b).
78. Provide copies of the records of the monthly condensate closed collection system inspections from January 2010 through June 2021.
79. Provide copies of the records of the annual condensate closed collection system Reference Method 21 evaluations from January 2010 through June 2021.
80. Provide copies of the negative pressure demonstrations for each enclosure opening from January 2010 through June 2021.
81. Provide copies of the monthly inspection records for the bypass lines in the closed vent system line from January 2010 through June 2021.
82. Provide complete copies of each semiannual excess emission report from January 1, 2015, to present.

40 C.F.R. Part 63 Subpart MM

83. Provide a complete copy, including all attachments, of the initial notification of compliance status report that was submitted. Also, provide complete copies of any revisions made to the notification of compliance status report.
84. Provide complete copies of each semiannual excess emission report from January 1, 2015, to present.

40 C.F.R. Part 63 Subpart JJJJ

85. Provide a complete copy, including all attachments, of the initial notification of compliance status report that was submitted. Also, provide complete copies of any revisions made to the notification of compliance status report.
86. Provide complete copies of each semiannual excess emission report from January 1, 2015, to present.

40 C.F.R. Part 60 Subpart BB

87. Provide complete copies of each semiannual excess emission report from January 1, 2015, to present.

40 C.F.R. Part 60 Subpart BBa

88. Provide complete copies of each semiannual excess emission report from January 1, 2015, to present.

ENCLOSURE 5

STATEMENT OF CERTIFICATION

I certify that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my personal inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001, 1341 and 1505.

_____
(Signature)

_____
(Printed Name)

_____
(Title)

_____
(Date)